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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

Kelly Wilson, an individual,

Plaintiff,

vs.

THE WALT DISNEY COMPANY, a
Delaware corporation; DISNEY
ENTERPRISES, INC., a Delaware
corporation; WALT DISNEY PICTURES, a
California corporation; WALT DISNEY
MOTION PICTURES GROUP, INC., a
California corporation; and DOES 1 through
25, inclusive,

Defendants.

Case No. 3:14-cv-01441-VC

**JOINT STIPULATION TO WITHDRAW
IN PART ADMINISTRATIVE MOTIONS
TO FILE UNDER SEAL MATERIALS
SUBMITTED IN SUPPORT OF CROSS
MOTIONS FOR SUMMARY JUDGMENT
& ~~PROPOSED~~ ORDER AS MODIFIED**

The Honorable Vince G. Chhabria

1 WHEREAS, on various dates in March 2015, in connection with the parties' cross-motions
2 for summary judgment, the parties filed Administrative Motions to File Under Seal certain
3 documents designated confidential by Defendants;

4 WHEREAS, on April 21, 2015, the Court entered an Order Regarding Administrative
5 Motions to File Under Seal (Dkt. 156), tentatively ruling that none of the materials sought to be
6 sealed in connection with the parties' cross-motions for summary judgment should be sealed;

7 WHEREAS, on June 10, 2015, the Court informed the parties that certain personal
8 information of non-parties, such as non-public email addresses, phone numbers, and an airline
9 frequent flyer number, contained in materials submitted in connection with Plaintiff's Partial
10 Motion for Summary Judgment and Plaintiff's Opposition to Defendants' Motion for Summary
11 Judgment should be sealed;

12 WHEREAS, the parties have met and conferred and agreed to withdraw their respective
13 Administrative Motions to File Under Seal to the extent that those motions relate to materials
14 other than the documents that have been selectively redacted to protect against the public
15 disclosure of personal information of non-parties to this litigation;

16 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY THE PARTIES
17 AS FOLLOWS:

18 1. Defendants withdraw, in its entirety, their Administrative Motion to File Under
19 Seal Documents Designated Confidential filed on March 12, 2015 (Dkt. 84).

20 2. With Defendants' consent, Plaintiff withdraws in part her Amended Administrative
21 Motion to File Under Seal Exhibits to Declaration of Mischa N. Barteau in Support of Plaintiff's
22 Motion for Partial Summary Judgment filed on March 16, 2015 (Dkt. 105), to the extent it seeks to
23 file under seal materials *other* than unredacted versions of Exhibits 62, 64, and 67 to the Barteau
24 Declaration. (*See* Declaration of Jordan D. Segall in Support of Plaintiff's Administrative Motion
25 to File Under Seal ¶¶ 5(e)-(f), 8 (Dkt. 142).) The parties stipulate that Exhibits 62, 64, and 67 to
26 the Declaration of Mischa N. Barteau in Support of Plaintiff's Motion for Partial Summary
27 Judgment can and should be filed under seal, as they contain personal, non-public information of
28 individuals who are not parties to the case and who have a clear interest in maintaining this
information as confidential and not publicly known.

3. With Defendants' consent, Plaintiff withdraws in part her Administrative Motion to File Under Seal Exhibits to Declaration of J.A. Ted Baer in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment filed March 19, 2015 (Dkt. 129), to the extent it seeks to file under seal materials *other* than an unredacted version of Exhibit 6 to the Baer Declaration. (See Declaration of Erin J. Cox in Support of Plaintiff's Administrative Motion to File Under Seal ¶ 2(a) & Ex. A thereto.) The parties stipulate that Exhibit 6 to the Declaration of J.A. Ted Baer in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment can and should be filed under seal, as it contains personal, non-public information of an individual who is not a party to the case and who has a clear interest in maintaining this information as confidential and not publicly known.

4. Defendants withdraw, in its entirety, their Administrative Motion to File Under Seal Documents Designated Confidential filed on March 26, 2015 (Dkt. 149).

IT IS SO STIPULATED.

DATED: June 16, 2015

FOLEY BEZEK BEHLE & CURTIS, LLP
J. PAUL GIGNAC
MISCHA N. BARTEAU

LAW OFFICE OF J.A. TED BAER
J.A. TED BAER

By: /s/ J. Paul Gignac

J. PAUL GIGNAC

Attorneys for Plaintiff Kelly Wilson

DATED: June 16, 2015

MUNGER, TOLLES & OLSON LLP

By: /s/ Kelly M. Klaus

KELLY M. KLAUS

Attorneys for Defendants

1 In accordance with Local Rule 5-1(i), the filer attests that each of the above signatories
2 have concurred in the filing of this document.

3
4 DATED: June 16, 2015

By: /s/ Mischa N. Barteau

5 MISCHA N. BARTEAU
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~~PROPOSED~~ ORDER AS MODIFIED

The Court, having reviewed the parties' Joint Stipulation to Withdraw in Part Administrative Motions to File Under Seal Materials Submitted in Support of Cross Motions for Summary Judgment, hereby orders as follows:

1. Plaintiff's Amended Administrative Motion to File Under Seal Exhibits to Declaration of Mischa N. Barteau in Support of Plaintiff's Motion for Partial Summary Judgment filed on March 16, 2015 (Dkt. 105) is **GRANTED** with respect to Exhibits 62, 64, and 67 to the Barteau Declaration; and

2. Plaintiff's Administrative Motion to File Under Seal Exhibits to Declaration of J.A. Ted Baer in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment filed March 19, 2015 (Dkt. 129) is **GRANTED** with respect to Exhibit 6 to the Baer Declaration. The public, redacted version of Exhibit 6 to the Baer Declaration is filed at Docket Number 143-1.

IT IS SO ORDERED.

Dated: June 23, 2015



Honorable Vince G. Chhabria